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 M/S 010
 US Department of Energy
 Office of Civilian Radioactive Waste Management
 Yucca Mountain Site Characterization Office
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JAN 11 2000

January 11, 2000

Subject: Comments on the DEIS for a Repository at Yucca Mt dated July 1999

Dear Ms Dixon,

1... I find this DEIS to be woefully incomplete and legally inadequate.

2 The DEIS can be summarized this way:

'This plan is safe -- so safe that there are no impacts. All the calculated risks that we looked at are statistically insignificant. There is no need for mitigation or compensation.'

This reminds me -- No! - this repeats the arrogant complacency of the scientists of the Atomic Energy Commission, who told us 40 years ago that it was safe for us to stand with our children in the middle of Fremont Street and take snapshots of the mushroom clouds -- the clouds that wrought devastation not only at the detonation sites but rained death for hundreds of miles downwind.

Your DEIS says that there is insignificant risk. Gentlemen and Ladies, I do not believe you.

Here are my specific complaints:

Alternatives:

3 The 'no action' alternative is an unreasonable alternative. It is undoable. Absolutely no one would ever seriously consider institutional control for a bare 100 years -- and one of the options suggest institutional control for a mere 100 years, and then abandoning the sites to Nature. Your own lawyers have advised you that you must present a reasonable 'no action' alternative. You have not done this.

4 Even though you were not required to do so by law, you should have considered alternate technologies to a geologic disposal. There is no confidence for those of us who live here in Las Vegas Valley that geologic disposal of any kind can actually work for 10,000 years.

5... Even though you were not required to do so by law, you should have considered alternate geologic disposal sites. You should have at least considered siting on the stable continental craton.

5 cont. Even though you were not required to do so by law, you should have considered an alternate to encapsulate or otherwise stabilize the waste on site, where it now rests. This alternative would have completely negated all risk and all exposure incurred to people and

- 5 cont. the environment along the transportation routes. There would be no contamination spread to any materials, plants, animals or people during handling or transportation.

Calculated and Perceived Risk:

- 6 Your calculated risk analysis due to earthquake and seismic activity is unbelievable. Just this past October, all of us here in the Valley were awakened in our beds from an earthquake. My friend who lives near Indian Springs described it as a train roaring through her home. Indian Springs is less than 20 miles from Yucca Mountain. From personal experience, I simply do not believe your analysis of geologic risk.
- 7 The calculated risk due seismic activity does not consider risk to cargo enroute to Yucca Mountain. This by itself is a grievous failure of the DEIS.
- 8 The entire issue of calculated risk is a major concern. There is no mention of the degree of uncertainty associated with any of your calculated risk assessments. With no data to the contrary, I can only assume that the degrees of uncertainty are high.
- The calculated risk must use accurate data and better estimates. It must include all risk factors, and must consider all known impacts to quality of life, the health of people and of the environment, and economic activity in the region.
- 9 There is no inclusion of perceived risk included in your analysis. Human behavior is based not just on science and rationality. There is a huge factor of perceived risk that does and will have a real and a significant impact. It was perceived risk and not real risk that kept over 500,000 people away from Las Vegas this past New Year's Eve. It is perceived risk that prevents teachers from moving to "the Valley with Yucca Mountain," and that causes people to rent apartments rather than settling permanently here in the city. These are real impacts that already occurring here in Las Vegas Valley.
- There is a huge perceived risk for the people and the economy in Jean. There is an intermodal point planned for Sloan/Jean. The truck yard, with its huge vehicles plastered with the radioactive symbols, will be in full view of every hotel room in Jean. The DEIS shows economic impacts too small to measure, and this is certainly wrong. Not only do economic impacts need to be estimated, but the possible effect on land values must be addressed.
- There must be an analysis of the impacts of perceived risk and stigma on the quality of life and the health of the people who live here, our ecosystems, and the economy of the region.
- 10 The calculated health risks include only a discussion of latent cancer deaths. There is no assessment of ill health short of death, nor of any death except that caused by cancer. An obvious omission are injuries and deaths caused by increased traffic and by accidents. This by itself is a grievous omission of the DEIS.
- 11... The area at risk along the transportation routes is considered to be merely a ½ mile corridor. The risk area around the intermodal points is a full mile, and the risk areas

- 11 cont. around nuclear plants and other waste sites is currently a 50 mile radius. The ½ mile corridor woefully understates the risk.
- 12 Your risk calculations are based on unreasonable figures. You used 1990 population figures. We all know that Las Vegas is the fastest growing city in the nation. The Northern Belt Way is not even built yet, nor are the housing and shopping areas built around it yet. You estimate 80,000 people live around the Beltway. The County estimates that 380,000 people will live around the Beltway in 2010. The calculated risk and exposure will be gravely larger with an accurate estimate of the Valley's population.

Transportation issues:

- 13 There is no mention of actions to prevent, or for compensation or mitigation for increased wear and tear to our highway infrastructure, or for repair caused by accidents or incidents. In a transport 6 years ago to the low-level disposal site, there was a circus of damaged bridges and culverts left across the County, indeed, across the country. At another time, there was an incident where radiation escaped from the transport vehicle. An entire section of highway had to be dug up, containerized and shipped to the waste facility as radioactive waste. Not only is there repair to the highway, but there is marked impact to surrounding ecosystems. In particular, if there had been a riparian or spring ecosystem involved, the impact could have been tragic for endangered and threatened species. Almost all transportation routes within Clark County are through the habitat of the endangered desert tortoise. This kind of accident will indeed happen again. Using your own DOE accident and incident data, Clark County estimates that 46 such incidents of surface contamination will occur within Clark County for the Proposed Action of this DEIS, and that 3 incidents of radioactive contamination beyond the vehicle will occur. These figures are only within Clark County! The response to all such accidents and incidents must be addressed within the DEIS.
- 14 The transportation vehicle is expected to be 220 feet long. It may not be able to travel more than 10 miles an hour. You will not be able to use interstate highways with such a load. In fact, any highway that has such a load may have to be closed to all other traffic. Heavy-haul traffic is currently required to occur during daylight hours, which is safer for visibility, but also more dangerous because of increased traffic. This situation is just entirely undoable, for Las Vegas Valley and many, many other metro areas across the nation.

Other weak assumptions or omissions:

- 15 Health insurance does not cover nuclear exposure. There is no mention of how people are to be provided health care when they become sick.
- 16 I see no evidence that the casks will perform as expected. You have no prototype, only a computer simulation. We all know that computer simulation is inadequate for weapons testing. I cannot possibly rest assured that this proves cask integrity.
- 17... There is no mention of compensation or mitigation because of an increase in government services required because of the activity here. There will be an increased need for

17 cont. government inspectors in several different organizations, increased law enforcement, etc.
etc.

18 There is no mention, nor is there any data given, for emergency action plans to be developed at Yucca Mountain, within the metropolitan area of Las Vegas, nor any other metro area that your transportation routes go through, nor any where along those transportation routes. An accident not only can but will occur at some time, some where. Every inch of the way needs information to develop their own emergency action plans.

19 Refusing to acknowledge the Ruby Valley Treaty of 1863 is reprehensible.

20 All the nations and peoples who live along the transportation routes must be involved in complete and thorough negotiations with our government in the development of this DEIS.

The consideration of environmental justice issues is ridiculously weak. The DEIS says that there will be no impact to environmental justice. The fact that the transportation routes go through major metro areas by itself indicates that minority and poor people will be disproportionately affected. You cannot hide your head in the sand. The impact is there and it must be addressed.

21 The DEIS has not been offered in Spanish, even though Las Vegas has a large Spanish-speaking community. Nor has the DEIS been offered in ways that visually impaired people can have access to it. This is an EIS of such large and far-reaching consequences that these actions must be taken, in order to have the public participation that is required by law.

22 There is no mention of the impacts to the dairy at Amargosa Valley, nor of the impacts caused by or to the electronic battlefield that Fallon NAS operates along one of the transportation routes. I question the safety of nuclear waste shipments made through an electronic battlefield.

In summary:

1 cont. The action proposed in this DEIS scares me. It scares me for my own health and safety, for my son's and my neighbor's health and safety, and for the environment's health and safety.

We must come up with a better plan.

Jane Feldman
Sincerely,
Jane Feldman

Resident, City of Las Vegas